

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RAW STORY MEDIA, INC., ALTERNET	:	
MEDIA, INC.,	:	NO. 1:24-cv-01514-CM
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
OPENAI, INC., OPENAI GP, LLC,	:	
OPENAI, LLC, OPENAI OPCO LLC,	:	
OPENAI GLOBAL LLC, OAI	:	
CORPORATION, LLC, OPENAI	:	
HOLDINGS, LLC,	:	
	:	
Defendants.	:	
	:	
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MOTION TO ADMIT COUNSEL *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, Rose S. Lee hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC.

I am good standing of the bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: March 26, 2024

MORRISON & FOERSTER LLP

By: /s/ Rose S. Lee

Rose S. Lee (*pro hac vice pending*)

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Attorneys for Defendants

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OPENAI, LLC, OPENAI OP CO LLC,

OPENAI GLOBAL LLC, OAI

CORPORATION, LLC, and OPENAI

HOLDINGS, LLC